

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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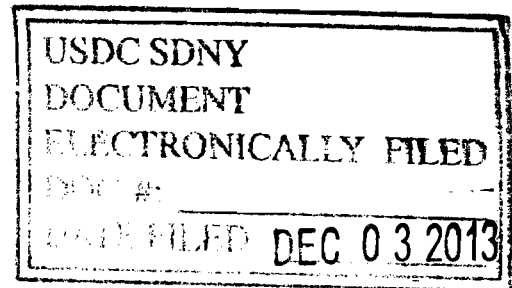
UNITED STATES OF AMERICA

- v. -

JOSEPH MANUEL HUNTER,
a/k/a "Frank Robinson,"
a/k/a "Jim Riker,"
a/k/a "Rambo,"
TIMOTHY VAMVAKIAS,
a/k/a "Tay,"
DENNIS GOGEL,
a/k/a "Dennis Goegel,"
a/k/a "Nico,"
MICHAEL FILTER,
a/k/a "Paul," and
SLAWOMIR SOBORSKI,
a/k/a "Gerald,"

Defendants.

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S7 13 Cr. 521 (LTS)

PROTECTIVE ORDER
PERTAINING TO DISCOVERY

UPON application of the Government:

WHEREAS, the defendants have certain rights under the United States Constitution, federal statutes, and the Federal Rules of Criminal Procedure, to pre-trial discovery;

WHEREAS, the Government recognizes its obligation to provide such discovery materials to the defendants, consistent with the need to protect public safety, the safety of witnesses, and the confidentiality of ongoing investigations;

WHEREAS, the discovery materials that the Government intends to provide to the defendants contain certain materials

(the "Protected Material") that, if disseminated to third parties, could, among other things, pose a threat to public safety and the safety of witnesses, and could impede ongoing investigations;

IT IS HEREBY ORDERED, pursuant to Federal Rule of Criminal Procedure 16(d), that the Government may identify as Protected Material pursuant to this Order discovery material tending to identify individuals who have provided information or assistance to law enforcement (including confidential sources), tending to disclose the fact that an individual has provided information or assistance to law enforcement (including confidential sources), or reflecting communications between individuals (including confidential sources) and the defendants or their co-conspirators;

IT IS FURTHER ORDERED that Protected Material may be identified by the Government by means reasonably providing notice that the discovery material is protected pursuant to this Order, including by (a) labeling physical documents containing Protected Material as "Protected Material," (b) placing electronic files containing Protected Material in directory folders or subfolders labeled "Protected Material," (c) labeling electronic media containing Protected Material as "Protected Material," and/or (d) identifying Protected Material with

reasonable specificity by letter or email provided to defense counsel;

IT IS FURTHER ORDERED that discovery materials provided by the Government to counsel of record that are identified by the Government as Protected Material, including copies thereof and any originals or copies provided to the defendants, shall not be further disseminated by the defendants or their respective counsel to any individuals, organizations or other entities, other than:

(i) members of the defense team (co-counsel, paralegals, investigators, translators, litigation support personnel, the defendant, and secretarial staff); and

(ii) defense expert(s).

Each of the individuals to whom disclosure of discovery materials is made shall be provided a copy of this Protective Order by counsel of record and shall be advised by counsel of record that he or she shall not further disseminate materials identified as Protected Material except by the express direction of counsel of record. In addition, counsel of record for the defendants or any defense investigator may show (but not provide copies of) discovery containing Protected Material to witnesses or potential witnesses, if it is determined that it is necessary to do so for the purpose of preparing the defense of the case;

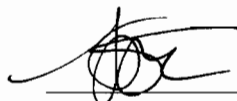
IT IS FURTHER ORDERED that all discovery materials containing Protected Material are to be provided to the defense, and used by the defense, solely for the purpose of allowing the defendants to prepare their defenses to the charges in the Indictment, and that none of the discovery materials produced by the Government to the defense shall be disseminated to any other third party not described in the preceding paragraphs;

IT IS FURTHER ORDERED that defense return or destroy all discovery material containing Protected Material (including all copies thereof), at the conclusion of the trial or when any appeal has become final; and

FINALLY, IT IS FURTHER ORDERED that nothing in this Order shall preclude the Government from seeking a further protective order pursuant to Rule 16(d) as to particular items of discovery material.

Dated: New York, New York
December 2, 2013

SO ORDERED:



THE HONORABLE LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE